

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

A&J PRODUCE CORP.

Plaintiff

V.

KOREAN PRODUCE BUYING SERVICE,
INC., t/a K.P.T.

and

YONG H. KIM

Defendants

Civil No. 07cv7008 (JSR)

MOTION FOR PRELIMINARY INJUNCTION

Upon the verified affidavit of the representative of the plaintiff, and the accompanying memorandum in support, plaintiff moves the Court to issue a preliminary injunction under Rule 65(b) of the Federal Rules of Civil Procedure enforcing the statutory trust pursuant Section 5(c) of the Perishable Agriculture Commodities Act, 7 U.S.C. §499e(c), by restraining the transfer of any and all trust assets of Korean Produce Buying Service, Inc., t/a K.P.T. except for any payment to plaintiff until there is either full payment to plaintiff of \$176,342.50 pending the final outcome of this action.

Dated this 6th day of August, 2007.

Respectfully submitted

LAW OFFICES OF BRUCE LEVINSON

By: /s/ Bruce Levinson

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